



SOLÓRZANO-CARVAJAL-GONZÁLEZ-PÉREZ-CORREA

July 9, 2019

VIA ELECTRONIC MAIL AND ECF

Honorable Shelley C. Chapman
United States Bankruptcy Judge
Southern District of New York
One Bowling Green
New York, NY 10004
scc.chambers@nysb.uscourts.gov

Re: *In re: Perforadora Oro Negro S. de R.L. de C.V., et al.*, Case No. 18-11094 (SCC)
(Jointly Administered)

Dear Judge Chapman:

This letter is in regard to the meeting I held on June 26, 2019 with Paul M. Leand, Jr. ("Mr. Leand"), financial advisor to the Bondholders, Daniel Díaz Álvarez, Mexican litigation counsel to Bondholders and the Singapore Rig Owners, Vicente Bañuelos Rizo, Mexican litigation counsel to Nordic Trustee, Santiago García Luque, Mexican litigation counsel to the Bondholders and the Singapore Rig Owners, Roberto García González ("Mr. García"), Mexican criminal counsel to the Bondholders and the Singapore Rig Owners, H. Christopher Boehning and Andy Rosenberg ("Mr. Rosenberg"), U.S. counsel to the Bondholders (the "Meeting"). The Meeting took place at my offices in Mexico City, although Mr. Rosenberg and two other members of his team, connected through video conference. The purpose of the Meeting was to discuss certain matters regarding the Chapter 15 proceeding of Integradora de Servicios Petroleros Oro Negro, S.A.P.I. de C.V. and Perforadora Oro Negro S. de R.L. de C.V (together, "Oro Negro"), including whether I should hire independent counsel. Mr. Leand gave a short introduction regarding the Bondholders' current position, and then Mr. Rosenberg gave an approximately two-hour long presentation on certain specific issues of the Chapter 15 proceeding.

Once Mr. Rosenberg concluded his presentation and had disconnected, Mr. García approached me and very insistently (in front of all participants) requested me on two occasions to have a private five-minute meeting. I must point out that Mr. García's attendance to the Meeting seemed unnecessary, as he is a criminal lawyer, and the criminal investigations were not considered to be discussed during the Meeting; indeed, Mr. García had no significant intervention during the whole Meeting. I finally agreed to meet with Mr. García in a separate conference room, where he talked for several minutes.

A handwritten signature in blue ink, appearing to be "S. García", written vertically along the right margin of the page.



To the best of my recollection, Mr. García started stating that he was very frustrated about his law firm being named defendant in the lawsuit brought before Judge Chapman in the Chapter 15 proceeding (the “Chapter 15 Claim”). He expressed that the case was now personal for him, and that he would wake-up every morning for the following 20 years to think ways how to take reprisals on Oro Negro’s shareholders and Quinn Emanuel Urquhart & Sullivan, LLP.

Mr. García also warned me to be extremely careful with all the decisions I would make as liquidator (*Síndico*) in the Oro Negro bankruptcy proceedings and the Chapter 15 proceeding, especially with everything I would sign, agree, approve or ratify. He finally said I could incur in actionable liability in connection with my actions as a liquidator, and specifically in those actions regarding the Chapter 15 Claim.

I feel that Mr. García’s overture was extremely inappropriate and that it should be brought to Your Honor’s attention. I take the message delivered by Mr. García as a threat to me, a private officer appointed by the Mexican federal judiciary,¹ aiming to influence my future decisions. More importantly, I truly believe that this threat, coming from a criminal attorney who has filed numerous criminal claims against Oro Negro’s representatives, should be taken very seriously.

I authorize Quinn Emanuel to file this letter on my behalf.

Respectfully submitted,



Fernando Perez Correa Camarena

¹ I was appointed as conciliator and then ratified as liquidator (*síndico*) by the Federal Institute of Commercial Bankruptcies Specialists (*Instituto Federal de Especialistas de Concursos Mercantiles*), which is a branch of the Federal Judiciary Committee (*Consejo de la Judicatura Federal*).